I submit these comments on behalf of the Partnership for America's Children. The Partnership's mission is to support its network of state and community multi-issue child advocacy organizations in effective advocacy. The Partnership for America's Children served as the national hub on the undercount of young children in the 2020 Decennial Census. In this role the Partnership formed and continues to co-lead a national group of child-serving organizations that is working to improve the count of young children in all Census Bureau demographic products.

Formal Privacy and the ACS

The Partnership thanks the Census Bureau for its decision to delay the implementation of a formally private methodology for protecting privacy in the American Community survey (ACS) because the science does not yet exist to implement such a program. https://www.census.gov/newsroom/blogs/random-samplings/2022/12/disclosure-avoidance-protections-acs.html The Partnership continues to believe that in order to be able to produce child poverty data and other key measures of child well-being any methodology for protecting privacy in the ACS must keep the connection between data on children and data on adults in the same household.

Population Estimates

We thank the Census Bureau for allocating additional staffing resources to the Population Estimates program. Because the Population Estimates are used to allocate some federal funding directly, and also shape the American Community Survey which drives many other federal funding streams, improving the accuracy of these estimates is vital. We hope that the increased staffing will permit a year-round research program to further improve the blended base, given that right now so much staff time is needed to produce the population estimates. We applaud the improvements to the Population Estimates series that improve the count of young children, but note that does not correct all the relevant funding streams for young children. In particular, we urge the Bureau to conduct research to assess whether it can improve the total state population counts, which drive a very significant portion of all federal funding to states through the five programs that use the Federal Medical Assistance percentage (Medicaid, Children's Health Insurance Program, Foster Care, Adoption Assistance, and the mandatory portion of child care funding.)

CBAMS

The Partnership also thanks the Bureau for deciding to conduct CBAMS research every two years rather than waiting until 2028. In particular, thank you for including questions on young children in the planned research for 2023-2024. The Partnership recommends that the Bureau explain how it plans to build on the 2023-4 research in future years, and share with the public the 2022 research questions and responses so that census partners can learn from and build upon that work. Will the CBAMS also include focus groups every two years?

The Partnership recommends that as the Bureau develops its questions for the various CBAMS studies, staff review the communications research that the Partnership and other census partners conducted before the 2020 Census. It particularly recommends the research conducted by NALEO with immigrants, and its own research on counting young children.

Research for new OMB Standards on Race and Ethnicity

As the Bureau supports OMB in its review of Directive 15, we encourage the Bureau to provide support and research focused on children. The child population is more diverse than adults and young children are more diverse than older children. More children than adults are multi-racial and multi-ethnic, so the process of collecting and tabulating data on multiracial and multi-ethnic people is of particular importance for young children.

Because the update of Directive 15 is so important for children, we recommend that the Bureau make public an analysis of the 2015 National Content Test: Race and Ethnicity research data broken out by age. In addition, the 2020 census had 350 million separate write-in responses on race and ethnicity. We encourage the Bureau to provide OMB and the public with an analysis of the write-in responses broken out by age.

The Partnership also recommends that the Bureau put out a clear, public explanation of how assignments of race are made in the 2020 Census, and that the Bureau further review this process and conduct research on how best to do it in the future, if it continues to be required to assign race where people have not selected a race. In particular, when the Bureau revises this process we recommend that the Bureau stop assigning race on the basis of national origin. Just as the United States is very diverse, so are other countries; national origin is not an appropriate indicator of race. Instead we suggest that the Bureau research alternative approaches.

The Partnership also recommends further research on the exact language of a combined question for collecting data on race and ethnicity, including testing a question stem that instructs respondents to select all "race ***and/or*** ethnicities" that apply, and including the use of different examples for what people can write in to provide more detailed responses under the minimum standards. When the Bureau reports on this research, we urge that it include an age analysis.

Curated Data Enterprise

The Partnership asks the Bureau to provide further information on how the proposed curated data enterprise would affect the count of young children.

Ancestry on the ACS

The Partnership recommends that the Bureau delay any decision on removing the Ancestry question from the ACS. While we appreciate the need to reduce respondent burden and keep the ACS short, we also know that this data can be used for civil rights enforcement, and is closely related to ethnicity and national origin. It makes no sense to act on this piece separately.

If you have any questions about these comments, please contact me at jjones@foramericaschildren.org

Sincerely,

Jasmine Jones

Director of Member Engagement